



INDEPENDENT
COSMETIC
MANUFACTURERS
AND
DISTRIBUTORS, INC.

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July 28, 2000

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Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20832

RE: [Docket No. 98N-0359]

In response to a *Federal Register* Notice on June 26, 2000, the Independent Cosmetic Manufacturers & Distributors (ICMAD) would like to submit its comments regarding program priorities for CFSAN for fiscal (FY) 2001.

ICMAD would like to commend CFSAN on completion of 23 of the 110 "A" list items. This is an improvement and an achievement. We strongly encourage CFSAN to continue or step-up its efforts in harmonization so that labeling of cosmetic products be consistent and easily understood by the consumer. It is also necessary that the unique needs of the small business community be considered in any implementation of new regulations. Resources should continue to be provided to the Office of Cosmetics and Colors to allow the participation and input of the U.S. FDA in meetings that concern international harmonization.

We also applaud the streamlining of the Cosmetics Voluntary Registration Program (CVRP) although there is still room for improvement in the site's interactive capabilities. The ability to submit forms on line would be a significant advantage. To encourage small businesses to participate, it would also be extremely helpful to offer some sort of incentive program so the necessary time is taken to register.

ICMAD strongly encourages CFSAN to keep open its links to industry by continuing to provide industry assistance and in particular, approving resources and speakers for our cosmetic education workshops. This next February in New York City will be the 21st jointly sponsored workshop. The continuation of industry collaboration on the cosmetic handbook is another way of reaching out to CFSAN constituents.

One more issue of concern and one that should be an "A" list priority is finding a way to keep sources for cosmetic ingredient names current such as adopting the nomenclature in the most current CTFA Dictionary.

Respectfully submitted,

Penni Jones, Executive Director

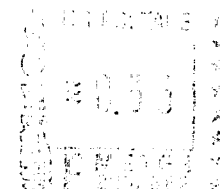
cc: Howard Baker, Chair, ICMAD Technical/Regulatory Compliance Committee
Robert Barash, ICMAD President

98N-0359

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